

ORIGINAL

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON DC 20554-0001

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JUL 17 1995

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IN THE MATTER OF:

AMENDMENTS TO THE AMATEUR SERVICE RULES
INCLUDING AMENDMENTS FOR EXAMINATION
CREDIT, ELIGIBILITY FOR A CLUB STATION
LICENSE, RECOGNITION OF THE VOLUNTEER
EXAMINER SESSION MANAGER, A SPECIAL EVENT
CALL SIGN SYSTEM, AND SELF-ASSIGNED INDICATOR
IN THE STATION IDENTIFICATION.

DOCKET WT 95-57

RM-8301

RM-8418

RM-8462

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COMMENTS

I wish to file COMMENTS in the above referenced Notice of Proposed Rule Making [Notice] released May 8, 1995 and comments due July 14, 1995. In the event that this is not received by the deadline, I request that it be accepted late.

EXAMINATION CREDIT

1. Paragraph 2 of the Notice contemplates giving credit for previously held amateur radio licenses. Obviously, this would only apply in those instances where the two-year grace period for renewal has also passed. It is proposed to allow this credit through the volunteer examiner program. Rather than apply this proposal through the volunteer examiner program, it should be administered by the Commission. This can be accomplished by allowing an unlimited grace period for the renewal of an amateur radio operator license as well as allowing for the application for an amateur radio station license by the holder of a valid operator license. The effect of this would be to allow for the renewal of any expired amateur radio license; if renewed within two years, the same call sign would be retained and if renewed after the two years, a new call sign would be issued. The granting of the new license by the Commission will be more efficient than processing it through the VE examination program. The charging of an application fee without the necessity of administering an examination is inappropriate and unwarranted.

By: [Signature] C-9
[Signature] WT

2. The purpose of this new rule will be defeated if the application must be processed through the VE examination program and the applicant does not have perfect documentation of their previous amateur license. Processing it through the Commission will allow for utilization of the Commission's records to document the expired license. Processing it through the Commission will also reduce the possibility of fraud in the event of partial documentation or in the event of use of documentation such as when the same names appear on the expired license and the new application [as might be in the case of a father and son]. Processing it through the Commission would allow access to dates of birth.

3. Utilizing other types of licenses issued by the Commission for amateur examination credit would be inappropriate except in the case of code credit being given for Radiotelegraph Operator licenses which is already provided for in Section 97.505(a)(7). There is no similarity between the various commercial examination elements and the amateur elements. Utilization of licenses issued by other United States government agencies would be inappropriate. While there may be some similarity to the amateur examination elements, the need for this type of credit should be very minimal since holders of these authorizations probably would also hold an FCC license. Utilization of licenses issued by foreign governments is completely inappropriate because of the extreme difficulty in determining and comparing the different licenses that are issued by every country in the world as well as determining the validity of the authorization. It would also increase the possibility of fraud as well as the ability to obtain an FCC authorization by utilizing an allegedly similar foreign license for examination credit.

VE SESSION MANAGER

4. Proposed Section 97.509(a) will require that the VE session manager be in attendance during the entire session. This section must be modified to clarify what is meant by attendance. If it implies the same level of attendance as required for a VE in Section 97.509(c), namely, present and observing the

examinees throughout the entire examination, it would be extremely difficult to have one single individual present at the testing of all examinees. It would eliminate the ability to have testing in more than one room as well as other flexibility now utilized in the VE program. It would also require necessary breaks in the testing to allow for the needs of this individual. If the desired attendance is less than that contemplated in Section 97.509(c), it should be changed to match the desired level. Perhaps the wording of the last sentence of Section 97.509(a) should be changed to read, "There must be a VE session manager who is present and available during the examination session " The duties are actually stated in the proposed Section 97.515(c).

5. Section 97.515(b) should be modified to not require the announcement to be made by the VE session manager. The only requirement should be that the VE session manager ensure that the proper announcement has been made.

6. Section 97.515(d) should indicate that the log be maintained for a period of one year and that it be made available for Commission inspection.

SPECIAL EVENT VANITY CALL SIGN SYSTEM

7. The definition for the special event call sign system in Section 97.3(a)(11)(ii) is not clear as to whether the holder of this call sign would be prohibited from utilizing their "regular" call sign during the period of validity of the special event call sign. Use of the special call sign should only be permitted in conjunction with an event of special significance while their "regular" call sign would be utilized at other times.

8. The requests for a one-by-one format call sign should be limited to holders of the Amateur Extra Class license.

9. The definition of the one-by-one format call sign contained in Section 97.19(e)(1)(iv) should be modified to also contain the definition contained in the

second sentence of Paragraph 6 of the Notice. The region number should be clarified to show that it is the 1 through 0 number that matches the regions in the continental United States with Alaska, Caribbean, and Hawaii/Pacific being assigned 7, 4, and 6 respectively. It should also be required to utilize the region number that matches the operating location.

10. There should be a mandatory 30-day period between successive assignments of the same call sign. This is necessary to prevent confusion [particularly for those that will be obtaining confirmations or QSL cards from the special station] between two separate uses of the same call sign. It will also help to preclude collusion between individuals to circumvent the 15-day limitation on the assignment of the call sign. Without the waiting period, it would be possible, for example, for five individuals to apply for consecutive 15-day periods to allow for a continuous 75-day period of use of the same call sign.

SELF-ASSIGNED INDICATOR

11. Section 97.119(c) should have another sentence added as follows, "If the self-assigned indicator denotes an FCC authorized call sign prefix for a specific area, a station utilizing that self-assigned indicator must be operating from that area." Without this sentence, it would be possible for W1AA to identify as W1AA/KP2 while still operating in Boston [as opposed to the Virgin Islands as it would appear] as noted in footnote 12 of the Notice.

CONCLUSION

12. Based on the above, it is requested that the proposed Rules be modified as noted above.

Respectfully submitted,



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July 7, 1995